Remarks

In the Office Action, the Examiner rejected claim 26 under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicants regard as the invention. The Examiner also rejected claims 34 and 45-51 under 35 U.S.C. §101. The Examiner also rejected claims 20, 24-28, 30-31, 33-37, 39-50, and 52-63 under 35 U.S.C. §102(e) as being anticipated by the U.S. Patent 6,404,445 issued to Galea, et al. ("Galea"). The Examiner also rejected claims 21-22 under 35 U.S.C. §103(a) as being unpatentable over Galea in view of the U.S. Patent 6,564,218 issued to Roth ("Roth"). The Examiner also rejected claims 23, 29, 32, and 51 under 35 U.S.C. §103(a) as being unpatentable over Galea in view of the U.S. Patent 7,093,263 issued to Sexton, et al. ("Sexton"). The Examiner also rejected claim 38 under 35 U.S.C. §103(a) as being unpatentable over Galea in view of the U.S. Patent 5,818,936 issued to Mashayekhi ("Mashayekhi").

In this Amendment, Applicants have amended claims 26, 52, 56, 59, and 60. Applicants have also added claims 64-74. Applicants have canceled claims 28-30, 33-34, 39-41, 45, and 54-55. Accordingly, claims 20-27, 31-32, 35-38, 42-44, 46-53, and 56-74 will be pending after entry of this Amendment.

I.   Rejection of claim 26 under 35 U.S.C. §112

In the Office Action, the Examiner rejected claim 26 under §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicants regard as the invention. Specifically, the Examiner stated that there is insufficient antecedent basis for the term "before the receiving" that is

recited in the claim. Applicants have amended claim 26. Accordingly, Applicants respectfully request reconsideration and withdrawal of the §112 rejection of claim 26.

II.   Rejection of claims 34 and 45-51 under 35 U.S.C. §101

In the Office Action, the Examiner rejected claims 34 and 45-51 under §101 as being directed towards non-statutory subject matter. Specifically, the Examiner stated that the claims are directed to software *per se* and do not fall within the four statutory categories. With respect to claims 34 and 45, Applicants respectfully disagree with the Examiner, but have chosen to cancel claims 34 and 45 for other reasons not related to the patentability of the claims.

For several reasons, Applicants respectfully traverse the §101 rejection of claims 46-51. *First*, as defined in §101, the four statutory categories of subject matter are process, machine, manufacture, and composition of matter. *See* 35 U.S.C. §101. Claims 46-51 recite a system that includes a server and a database. Servers and databases are physical objects in the real world. As such, a system comprising a server and a database is properly categorized as a machine. Therefore, Applicants respectfully submit that claims 46-51 are not software *per se*, but rather are patentable subject matter.

Second, claims 46-51 recite a system that provides useful, tangible, and concrete results, and therefore recite patentable subject matter. Claims 46-51 recite a system comprising, at least, a database and a server communicatively coupled to the database for creating a description of a user interface that transacts with the database. The claims provide the useful result of a description of a user interface which enables transaction with a database. Claims 46-51 provide a tangible result through their non-abstract

matter. The database must necessarily be a non-abstract (i.e. tangible) collection of data that can be physically manipulated. Additionally, claim 46 produces a concrete (i.e. repeatable) result. Every time the system creates a description of the database, the system does so based upon classifying entities into entity types.

Accordingly, Applicants respectfully submit that claims 46-51 recite statutory subject matter. In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the §101 rejection of claims 46-51.

III.   Rejection of claims 20-27

In the Office Action, the Examiner rejected claim 20 under §102(e) as being anticipated by Galea. Claims 21-27 are dependent directly or indirectly on claim 20. Claim 20 recites a method for creating a description of a user interface that transacts with a database. The database has a data model that includes several entities. The description is created using the data model of the database. The method classifies the entities into entity types. In classifying, the method determines whether a first entity satisfies a first set of conditions and classifies the first entity as a first entity type upon determining that the first entity satisfies the first set of conditions. The method creates the description of the user interface based upon the classification of the entities.

For at least two reasons, Applicants respectfully submit that Galea does not disclose, teach, or even suggest the method of claim 20. *First*, Galea does not disclose, teach, or even suggest classifying entities into entity types. In the Office Action, the Examiner cited Galea, column 5, lines 23-50. *See* Office Action, page 4. The cited section describes a database that contain compiled product or service components.

Specifically, Galea describes these product or service components as containing descriptive information which binds them to their respective graphical user interface representations. To input this descriptive information, a site designer uses a modification window. *See* Galea, Fig. 8. However, nowhere in the cited section or anywhere else does Galea disclose classifying entities into entity types.

Second, Galea does not disclose, teach, or even suggest classifying an entity upon determining that the entity satisfies the set of conditions. In the Office Action, the Examiner stated that domains are entities and each entity describes a type of data such as various user interface elements. *See* Office Action, page 5, last sentence. Applicants respectfully disagree that the domains are the entities as recited in the claim. As described by Galea, domains are compiled product or service components that include descriptive information. *See* Galea, column 5, lines 23-26. Furthermore, Galea does not describe classifying any one of these domains upon determining that they satisfy a set of conditions. Therefore, Galea does not disclose, teach, or even suggest classifying an entity upon determining that the entity satisfies a set of conditions.

Accordingly, Applicants respectfully submit that Galea does not render claim 20 unpatentable. As claims 21-27 are dependent directly or indirectly on claim 20, Applicants respectfully submit that claims 21-27 are patentable over Galea for at least the reasons discussed above for claim 20. In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 20-27.

IV. Rejection of claims 31-33

In the Office Action, the Examiner rejected claim 31 under §102(e) as being

anticipated by Galea. Claims 32 and 33 depend directly on claim 31. Claim 31 recites a computer readable medium storing a computer program which when executed by at least one processor creates a description of a user interface. The user interface transacts with a database having a data model that includes several entities. The description is created using the data model. The computer program classifies the entities into entity types. In classifying, the computer program determines whether a first entity satisfies a first set of conditions and classifies the first entity as a first entity type upon determining that the first entity satisfies the first set of conditions. The computer program creates the description of the user interface based upon the classification of the entities.

Applicants respectfully submit that Galea does not disclose, teach, or even suggest the computer readable medium of claim 31. In the Office Action, the Examiner rejected claim 31 under the same rationale as claim 20. Accordingly, for reasons similar to those stated above for claim 20, Applicants respectfully submit that Galea does not disclose, teach, or even suggest classifying entities into entity types. Also, for reasons similar to those stated above for claim 20, Applicants respectfully submit that Galea does not disclose, teach, or even suggest classifying an entity upon determining that the entity satisfies a set of conditions.

Accordingly, Applicants respectfully submit that Galea does not render claim 31 unpatentable. As claims 32 and 33 are dependent directly on claim 31, Applicants respectfully submit that claims 32 and 33 are patentable over Galea for at least the reasons discussed above for claim 31. In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 31-33.

V.   Rejection of claims 35-38

In the Office Action, the Examiner rejected claim 35 under §102(e) as being anticipated by Galea. Claims 36-38 depend directly on claim 35. Claim 35 recites a method for generating a user interface that transacts with a database. The database has a data model that includes several entities. The method receives a description of the user interface that is based upon classification of several entities into entity types. The classification includes classification of a first entity as a first entity type upon determination that the first entity satisfies a first set of conditions. The method generates the user interface using the description of the user interface.

Applicants respectfully submit that Galea does not disclose, teach, or even suggest the method of claim 35. In the Office Action, the Examiner rejected claim 35 under the same rationale as claim 20. Accordingly, for reasons similar to those stated above for claim 20, Applicants respectfully submit that Galea does not disclose, teach, or even suggest receiving a description of a user interface that is based upon classification of entities into entity types. Also, for reasons similar to those stated above for claim 20, Applicants respectfully submit that Galea does not disclose, teach, or even suggest classification of an entity as an entity type upon determination that the entity satisfies a set of conditions.

Accordingly, Applicants respectfully submit that Galea does not render claim 35 unpatentable. As claims 36-38 are dependent directly on claim 35, Applicants respectfully submit that claims 36-38 are patentable over Galea for at least the reasons

discussed above for claim 35. In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 35-38.

VI.   Rejection of claims 42-44

In the Office Action, the Examiner rejected claim 42 under §102(e) as being anticipated by Galea. Claims 43 and 44 are dependent directly on claim 42. Claim 42 recites a computer readable medium storing a computer program which when executed by at least one processor generates a user interface. The user interface transacts with a database having a data model that includes several entities. The computer program receives a description of the user interface. The description is based on classification of the entities into entity types. The classification includes the classification of a first entity as a first entity type upon determination that the first entity satisfies a first set of conditions. The computer program generates the user interface using the description of the user interface.

Applicants respectfully submit that Galea does not disclose, teach, or even suggest the computer readable medium of claim 42. For instance, Galea does not disclose, teach, or even suggest a computer program that receives a description where the description is based on classifying the entities into entity types. In the Office Action, the Examiner cited column 10, lines 44-57. *See* Office Action, page 10. The cited section describes entering graphical user interface tags. Specifically, user interface tags are entered to define relations between data and the graphical representation of the data. *See* Galea, column 10, lines 47-52. However, nowhere in the cited section or anywhere else

does Galea disclose, teach, or suggest receiving a description which is based on the classification of entities into entity types.

Accordingly, Applicants respectfully submit that Galea does not render claim 42 unpatentable. As claims 43 and 44 are dependent directly on claim 42, Applicants respectfully submit that claims 43 and 44 are patentable over Galea for at least the reasons discussed above for claim 42. In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 42-44.

VII. Rejection of claims 46-51

In the Office Action, the Examiner rejected claim 46 under §102(e) as being anticipated by Galea. Claims 47-51 are dependent directly or indirectly on claim 46. Claim 46 recites a system that includes a database that has a data model including several entities. The system includes a server coupled communicatively to the database. The server creates a description of a user interface that transacts with the database. The description is based on classification of the entities into entity types. The classification includes classification of the first entity as a first entity type upon determination that a first entity satisfies a first set of conditions.

Applicants respectfully submit that Galea does not disclose, teach, or even suggest the system of claim 46. In the Office Action, the Examiner rejected claim 46 under the same rationale as claim 20. Accordingly, for reasons similar to those stated above for claim 20, Applicants respectfully submit that Galea does not disclose, teach, or even suggest creating a description based on classification of entities into entity types. Also, for reasons similar to those stated above for claim 20, Applicants respectfully

submit that Galea does not disclose, teach, or even suggest classification of an entity upon determination that the entity satisfies the set of conditions.

Accordingly, Applicants respectfully submit that Galea does not render claim 46 unpatentable. As claims 47-51 are dependent directly or indirectly on claim 46, Applicants respectfully submit that claims 46-51 are patentable over Galea for at least the reasons discussed above for claim 46. In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 46-51.

VIII. Rejection of claims 52-57

In the Office Action, the Examiner rejected claim 52 under §102(e) as being anticipated by Galea. Claims 53-57 are dependent directly or indirectly on claim 52. Claim 52 recites a computer that includes a description of a data store. The computer includes a browser. The computer includes an application for generating user interface elements by using the description and by retrieving a data set from the data store to populate at least one user interface element. The user interface elements are for displaying in the browser, where at least one user interface element is for receiving queries for the data store.

Applicants respectfully submit that Galea does not disclose, teach, or even suggest the computer of claim 52. For instance, Galea does not disclose, teach, or even suggest a computer that includes an application for generating a user interface element for receiving queries on a data store. In the Office Action, the Examiner cited column 5, lines 51-59 of Galea. *See* Office Action, page 12. The cited section describes compilation of a configuration domain into a secure, binary compressed format. Galea

further states that all valid information and possible configurations are downloaded at one time from the server to the client so that the user can browse the information without accessing the server. *See* Galea, column 5, line 60-column 6, line 2. In other words, Galea describes sending a file that includes all configuration information for the user interface at once, where all browsing of the information in the domain occurs on the client side. This is in contrast to the user interface element for receiving queries. Hence, Galea does not disclose, teach, or even suggest a computer that includes an application for generating a user interface element for receiving queries on a data store.

Accordingly, Applicants respectfully submit that Galea does not render claim 52 unpatentable. As claims 53-57 are dependent directly or indirectly on claim 52, Applicants respectfully submit that claims 53-57 are patentable over Galea for at least the reasons discussed above for claim 52. In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 52-57.

IX.   Rejection of claims 58 and 63

In the Office Action, the Examiner rejected claims 58 and 63 under 35 U.S.C. §102(e) as being anticipated by Galea. Claim 63 is dependent directly on claim 58. Claim 58 recites a method that receives a first request for a first user interface to transact with a first data store. The method supplies a first description to generate the first user interface. The method receives a second request for a second user interface to transact with a second data store. The method supplies a second description to generate the second user interface. The first and second descriptions differ.

Applicants respectfully submit that Galea does not disclose, teach, or even suggest the method of claim 58. For instance, Galea does not disclose supplying a user interface for transacting with a data store. The Examiner cited column 4, lines 1-5 of Galea. *See* Office Action, page 14. This cited section describes a constraint-based configuration file that is mapped into a plurality of display pages at the client. Galea further states that all valid information and possible configurations are downloaded at one time from the server to client so that the user can browse the information without accessing the server. *See* Galea, column 5, line 60-column 6, line 2. In other words, Galea describes sending a file that includes all configuration information for the user interface at once, where all browsing of the information in the domain occurs on the client side. Therefore, Galea does not disclose supplying a user interface for transacting with a data store.

Accordingly, Applicants respectfully submit that Galea does not render claim 58 unpatentable. As claim 63 is dependent directly on claim 58, Applicants respectfully submit that claim 63 is patentable over Galea for at least the reasons discussed above for claim 58. In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 58 and 63.

X. Rejection of claims 59-62

In the Office Action, the Examiner rejected claim 59 under §102(e) as being anticipated by Galea. Claims 60-62 are dependent directly or indirectly on claim 59. Claim 59 recites a method for providing descriptions of user interfaces to users. The user interfaces are for transacting with a data store. The method receives a first request for a

from a first user. The method receives a second request from a second user. The first and second users have different roles. The method supplies a first description to the first user and a second description to the second user. The first and second descriptions are different based on the roles of the users.

Applicants respectfully submit that Galea does not disclose, teach, or even suggest the method of claim 59. For instance, Galea does not disclose, teach, or suggest supplying different descriptions of a data store to different users based on the roles of the users. In the Office Action, the Examiner cited Figure 1 of Galea. *See* Office Action, page 15. The cited figure illustrates two client computers connecting to a server computer. However, neither the cited Figure nor anywhere else in Galea discloses supplying different descriptions of the same data store to different users based on the roles. Therefore, Galea does not disclose, teach, or even suggest supplying different descriptions of a data store to different users, as recited in claim 59.

Accordingly, Applicants respectfully submit that Galea does not render claim 59 unpatentable. As claims 60-62 are dependent directly or indirectly on claim 59, Applicants respectfully submit that claims 60-62 are patentable over Galea for at least the reasons discussed above for claim 59. In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 59-62.

XI.   New Claims

In this amendment, Applicants have added claims 64-74. Applicants respectfully submit that claims 64-74 are fully supported by the disclosure and are patentable over the cited references.

Conclusion

In view of the foregoing, it is submitted that all pending claims, namely claims 20-27, 31-32, 35-38, 42-44, 46-53, and 56-74 are in condition for allowance. Reconsideration of the rejections and objections is requested. Allowance is earnestly solicited at the earliest possible date.

Respectfully submitted,

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